



March 4, 2013

California Environmental Protection Agency
1001 I Street
PO Box 2815
Sacramento CA 95812-2815

Attn: AB 32 Cap and Trade Auction Proceeds Investment Plan

Dear Sir or Madam:

The AB 32 cap-and-trade program has generated revenues that will be used to fund energy efficiency projects in California, and the California Environmental Protection Agency (Cal EPA) has been conducting a series of public workshops requesting input on how to spend the funds. The Governor's proposed budget estimates that \$200 million will be available in FY2013 and \$400 million will be available in FY2014.

The investment priorities for the cap and trade program revenues are energy efficiency upgrades related to water systems (pumping and distribution) and transportation with special consideration of disadvantaged communities.

A key component of transportation energy improvement programs should include street light efficiency projects because such projects improve safety, visibility and environmental protections related to transportation. Street lights improve safety on our roadways for cars, bicyclists and pedestrians, contribute to the usefulness of the State's complete roads strategy, multi-modal transportation and conversion of street lights to LED or other energy saving protocols save local governments money and improve environmental sustainability. Allowing AB 32 funds to be used by cities and counties to acquire, retrofit and replace existing high pressure sodium vapor lighting

systems commonly in use throughout California will allow for reductions in kilowatt hour usage, more efficient electrical energy usage, allow for adaptive controls capability and will allow for more effective long term maintenance and operations best practices.

Cal EPA has asked for written comments about how the cap and trade auction proceeds should be spent. While there are many choices about how this funding could be allocated to improve the environment and energy efficiency, few options are more cost effective than the wholesale retrofitting of the 1.8 million street lights in California's cities and counties.

CAL-SLA was organized in 1981 for the dual purpose of representing local governments before the California Public Utilities Commission (CPUC) to achieve equitable street light rates and acting as a clearinghouse for information on other street light matters. Currently we address traffic signal rates in addition to the street light rates.

The CPUC treats street lighting as a separate customer class. CAL-SLA speaks solely for street light customers—cities and counties in California. In the past 30 years CAL-SLA has intervened and actively worked on every major rate case submitted by the three utilities: PG&E, SCE, and SDG&E. CAL-SLA has saved California cities and counties more than \$100 million in lower electric rates for street lighting over the past three decades by evaluating the efficacy of the rate submittals, negotiating on behalf of government for new technologies and safety related programs and by identifying inconsistencies in the rate request assumptions.

CAL-SLA respectfully requests that the CAL EPA consider including street light acquisition, retrofit and replacement programs in the approved funding protocols for AB 32 cap and trade proceeds. This investment will benefit public safety and reduce energy use and greenhouse gas emissions.

Yours truly,



Greg Jobe
Chairman, Executive Committee
California City County Street Light Association

C: CAL-SLA Executive Committee
David J. Byers, Esq., CAL-SLA Legal Counsel
Alison Lechowicz, Rate Analyst, Bartle Wells, Inc.
Jean Bonander, Executive Director, CAL-SLA